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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
NOV 15 2023  
SEAN F. McAVOY, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

8 UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA  
11 *ex rel.* Bradley D. Keever, Relator,

12 Plaintiffs,

13 v.  
14

15 MISSION SUPPORT ALLIANCE,  
16 LLC; HANFORD MISSION  
17 INTEGRATION SERVICES, LLC;  
18 LEIDOS, INC; LEIDOS  
19 INTEGRATED TECHNOLOGY,  
20 LLC; CENTERRA GROUP LLC;  
21 PARSONS GOVERNMENT  
22 SERVICES, INC; LOCKHEED  
23 MARTIN CORPORATION;  
24 LOCKHEED MARTIN SERVICES,  
25 INC; WACKENHUT SERVICES,  
26 INC; and JACOBS ENGINEERING  
27 GROUP, INC.,  
28

Defendants.

No. 4:21-CV-05156-SAB

**FILED EX PARTE  
AND UNDER SEAL**

UNITED STATES' NOTICE OF  
ELECTION TO INTERVENE IN  
PART AND TO DECLINE TO  
INTERVENE IN PART

26 Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(2) and (4), the United  
27 States notifies the Court of its decision to intervene in part of this action and to  
28 decline to intervene in part of this action. The United States intervenes in the  
USA NOTICE OF INTERVENTION IN PART - 1

1 Relator's Complaint with respect to Defendants Hanford Mission Integration  
2 Services, LLC ("HMIS"); Leidos Integrated Technology, LLC; Centerra Group,  
3 LLC; and Parsons Government Services Inc. The United States declines to  
4 intervene in the action with regard to Defendants Mission Support Alliance, LLC;  
5 Leidos, Inc.; Lockheed Martin Corporation; Lockheed Martin Services, Inc.;  
6 Wackenhut Services, Inc.; and Jacobs Engineering Group, Inc. The United States  
7 intends to file and serve its own complaint within 90 days setting forth the  
8 intervened claims as well as additional claims by the United States against  
9 Defendant Hanford Mission Integration Services, LLC.

10 Pursuant to the Court's Order of October 5, 2023 (ECF No. 16), the United  
11 States has informed Defendant HMIS of Relator's Complaint. The parties have been  
12 engaging in discussion regarding the United States' investigation as well as  
13 discussions aimed at a potential resolution of this matter. The United States believes  
14 that keeping the matter under seal will allow the parties the best possible  
15 opportunity to continue their ongoing discussions with the goal of reaching a  
16 potential resolution of this matter without litigation. During the time of any  
17 extended sealing of the matter, the United States anticipates that the parties will  
18 diligently continue their ongoing substantive discussions in an effort to bring the  
19 matter to a timely conclusion. Accordingly, the United States requests that, at this  
20 time, the matter remain under seal for an additional 90 days, to and including  
21 February 12, 2024, or until further order of this Court. Additionally, the United  
22 States will file a status report with the Court by January 15, 2024, informing the  
23 Court as to the status of settlement negotiations.

24 Although the United States declines to intervene in a portion of the action,  
25 we respectfully refer the Court to 31 U.S.C. § 3730(b)(1), which allows the relator  
26 to maintain the declined portion of the action in the name of the United States;  
27 providing, however, that the "action may be dismissed only if the court and the  
28 Attorney General give written consent to the dismissal and their reasons for

1 consenting.” *Id.* Notwithstanding this language, the United States Court of Appeals  
2 for the Ninth Circuit has held that the United States has the right to a hearing only  
3 when it objects to a settlement or dismissal of the action. *United States ex rel.*  
4 *Green v. Northrop Corp.*, 59 F.3d 953, 959 (9th Cir. 1995); *United States ex rel.*  
5 *Killingsworth v. Northrop Corp.*, 25 F.3d 715, 723-25 (9th Cir. 1994). Therefore,  
6 the United States requests that, should either the relator or any defendant propose  
7 that the part of the action in which the United States has not intervened be  
8 dismissed, settled, or otherwise discontinued, this Court provide the United States  
9 with notice and an opportunity to be heard before ruling or granting its approval.

10 Furthermore, pursuant to 31 U.S.C. § 3730(c)(3), the United States requests  
11 that all pleadings filed in this action, even as to the non-intervened part of this  
12 action, be served upon the United States; the United States also requests that all  
13 orders issued by the Court be sent to counsel for the United States. The United  
14 States reserved its right to order any deposition transcripts and to intervene in the  
15 portion of this action in which it is declining to intervene today, for good cause, at  
16 a later date.

17 The United States reserves the right to seek the dismissal of the relator’s  
18 action or claim on any appropriate grounds, including under 31 U.S.C. §§  
19 3730(b)(5) and (e)(4).

20 A proposed order accompanies this notice.

21 Respectfully submitted this 15th day of November, 2023.

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Vanessa R. Waldref  
United States Attorney



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 15, 2023, a true and correct copy of the foregoing *United States' Notice of Election to Intervene in Part and to Decline to Intervene in Part* and the *Proposed Order*, were emailed to counsel for the Relator as follows:

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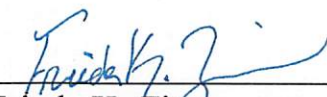
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Because this action is under seal pursuant to 31 U.S.C. §§ 3729, *et seq.*, defendants have not been served with copies of the foregoing Notice.

  
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Assistant United States Attorney